

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as currently amended and in light of the following discussion is respectfully requested.

As an initial matter, Applicants respectfully request that the Information Disclosure Statements filed September 28, 2001, April 29, 2002, and June 27, 2003, be considered and initialed by the Examiner. Copies of each filed IDS along with the corresponding date-stamped filing receipt are attached for convenience.

Claims 1-38 and 40-63 are pending in the application, Claims 1-31 and 52-63 were previously withdrawn from consideration. Claims 32, 35, 41, 46 and 49-51 are amended; and Claim 39 is canceled by the present amendment. Support for the amended claims can be found in the original specification, claims and drawings.¹ No new matter is presented.

In the outstanding Official Action, Claims 32-51 were rejected under 35 U.S.C. § 112, second paragraph, as indefinite, and under 35 U.S.C. § 102(e) as anticipated by Srivastava et al. (U.S. Patent No. 6,549,922, hereinafter "Srivastava").

The outstanding Official Action rejected Claims 32-51 under 35 U.S.C. § 112, second paragraph, as indefinite, citing the phrase "...a tree-structure set membership consisting of zero or more objects, said zero or more objects comprising zero or more parent objects and zero or more child objects....", recited in independent Claims 32, 35, 41, and 49-51. Specifically, the outstanding Official Action states that "there could be a case where there are zero child objects and zero parent objects therefore making the three consist of just the root. If that were the case then the rest of the limitations that refer to the parent and child objects would not apply."²

In response, independent Claims 32, 35, 41 and 49-51 are each amended to recite "...a tree-structure set membership consisting of one or more objects, said one or more

¹ e.g., specification, Figs. 37-41.

² Outstanding Official Action, pp. 2-3.

objects comprising one or more parent objects and one or more child objects, each child object respectively corresponding to one of said one or more parent objects”. Thus, the claims as amended positively recite that the tree-structure set memberships include one or more objects which include one or more parent objects and one or more child objects. Accordingly, the features of the claims relating to the parent and child objects must be considered.

Regarding Claim 46, the outstanding Official Action cites the phrase “the actually existing object” in line 3 as unclear due to insufficient antecedent basis. In response, Claim 46 is amended to recite “the object selected from the display tree structure”, to rely on this same feature recited in lines 13 and 14 of Claim 41, from which Claim 46 depends.

Further, in Claims 35, 41 and 50 the outstanding Official Action cites the recitation of “the object” in line 13 and “object selected” in line 14 of these claims as unclear. In response, Claims 35, 41 and 50 are amended to remove the phrase “thereby displaying a content and a structure of the selected object”, and therefore no longer recite “object selected”. Thus, this rejection is rendered moot.

Also, the outstanding Official Action rejected Claim 39 as indefinite. As Claim 39 is canceled by the present amendment, this rejection is rendered moot.

Accordingly, for at least the reasons discussed above, Applicants respectfully request that the rejection of Claims 32-51 under 35 U.S.C. § 112, second paragraph, be withdrawn.

In the outstanding Official Action, Claims 32-51 were rejected under 35 U.S.C. § 102(e) as anticipated by Srivastava. Applicants respectfully submit that amended independent Claims 32, 35, 41 and 49-51 state novel features clearly not taught or rendered obvious by the applied references.

As discussed in detail in the amendment filed October 27, 2005, the pending independent claims related to an object content structure management method/computer

program product for managing a content structure of a root object which includes attribute data corresponding to a media file.

Specifically, independent Claim 32, 35, 41 and 49-51 are each amended to recite, *inter alia*, an object content structure management method, comprising the step of:

expressing the content structure of said root object by a tree-structure set membership consisting of ***one or more objects, said one or more objects comprising one or more parent objects and one or more child objects***, each child object respectively corresponding to one of said one or more parent objects...

Each of independent Claims 32, 35, 41 and 49-51 recite additional features relating to the claimed parent and child objects.

Turning to the applied reference, Srivastava, describes an extensible framework for the automatic extraction and transformation of metadata into logical annotations.³ As illustrated in Fig. 2, Srivastava shows the content structure management method which includes a root file containing attribute data corresponding to a media file.

However, as admitted in the outstanding Official Action⁴, Srivastava has a tree-structure set membership “consisting of zero or more objects, said zero or more objects comprising zero parent objects and zero child objects.” The outstanding Official Action also states that “[s]ince the rest of the claim limitations deal with either the parent or child objects and since Srivastava has zero parent and child objects, the rest of the claim limitations are met.” (Emphasis Added).

In contrast, as discussed above, independent Claims 32, 35, 41 and 49-51 are each amended to recite that the root object is expressed by a tree-structure set membership consisting of “***one or more objects, said one or more objects comprising one or more parent objects and one or more child objects***”. As discussed in the outstanding Official Action,

³ Srivastava, Abstract.

⁴ The outstanding Official Action, p. 4.

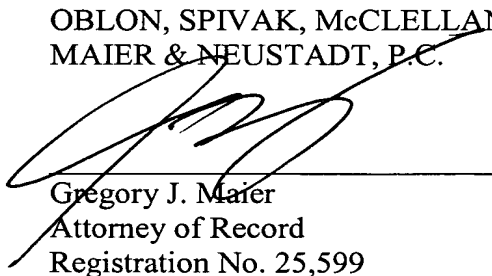
Srivastava has a zero parent objects and zero child objects. Therefore, Srivastava fails to teach or suggest the various features recited in the pending claims relating to the structure management method including *one or more parent objects and one or more child objects*.

Accordingly, Applicant respectfully requests that the rejection of amended independent Claims 32, 35, 41 and 49-51 (and the claims that respectively depend therefrom) under 35 U.S.C. § 102(e) be withdrawn.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 32-38 and 40-51 is definite and patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of the application is therefore requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Gregory J. Maier
Attorney of Record
Registration No. 25,599

Customer Number

22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)

Andrew T. Harry
Registration No. 56,959